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August 30, 2022

Hon. Richard M. Berman
U.S. District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: *US v. Chestnut, et al* 18 cr 612 {VOSP - Joywane Tomlinson}

Application is respectfully denied, due to the nature and number of outstanding violation specifications.	
SO ORDERED:	Richard M. Berman
Date: 8/31/22	Richard M. Berman, U.S.D.J.

Dear Judge Berman:

I am counsel for Jowyane Tomlinson, a defendant in the above referenced matter.

Please accept this letter in lieu of a formal motion requesting approval for Mr. Tomlinson to travel to Manhattan, for the day, on September 2, 2022.

As the Court is aware, Mr. Tomlinson is under supervision, where he resides, in the District of Connecticut. He is currently on location monitoring. It is my understanding that, due to Mr. Tomlinson being on location monitoring, any travel outside of his District of residence must be approved by the Court.

Mr. Tomlinson's girlfriend, Ashley Evans, is pregnant. She has an appointment for Friday, September 2, 2022, at 6 a.m., to deliver their baby (by cesarean section) at *Metropolitan Hospital* in Manhattan. Mr. Tomlinson desires to be present for the birth of his child. Accordingly, by this letter I am requesting approval for him to travel to Manhattan on September 2nd. More specifically, in order for him to arrive at the hospital by 6 a.m., I am requesting he be permitted to leave his residence at 3 a.m. Thereafter, I request he be permitted to stay at the hospital until 7 p.m. wherein he should be able to return to his residence by approximately 10 p.m.

Prior to submitting this application, I conferred with both the Government and Probation. Probation informs that they do not consent to this request due to Mr. Tomlinson's multiple arrests, noncompliance and the pending violation proceeding. However, the Government informs that, understanding Probation's concerns, it does not object to this request.

If approved, Mr. Tomlinson will provide details of his proposed travel to USPO Cimino and will remain in contact with USPO Cimino as directed.

Respectfully submitted,

/s/

Jeffrey G. Pittell

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 8/31/22
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cc: Jane Chong, AUSA
Mark Cimino, USPO